

National Animal Identification System Comments  
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The Wisconsin Pork Association (WPA) supports a voluntary/ mandatory ID system that has broad support from producers and industry segments. A program that does not have this support will not be cost effective and will not accomplish its goals in the long term. We need to identify species advisory groups that are controlled by producers in order to gain and keep the support of producers. These groups need to be selected by the states to insure local and state ownership. The national advisory group needs to be controlled by producers with representation from the states. These groups should meet at least annually and maybe more often in the program development stages. We suggest a voluntary trial period that demonstrates how the program can meet its goals for each of the species. One program will not fit all! The program should become mandatory when the species advisory committees recommend and support the mandatory phase of the program and the appropriate USDA agencies have sufficient funding for the mandatory program.

The program should be simple and require ID and tracking only when the premise registration number will not be effective in identifying the movement of animals. When ID at the farm is necessary, producers should be able to select a cost effective method from a list of approved methods.

The cost of any mandatory ID program should be funded primarily by the public. It is the public that our government is trying to protect with a mandatory program. The effort and time required by producers should be their contribution to the cost of the program. We all know since we produce a commodity and we are price takers, history tells us that upstream costs for the program will likely be passed back to the producer. Eventually the cost will be reflected in the price consumers pay.

Tracking animal movement when necessary should be the responsibility of the livestock buyer or in the case of youth, the Fair/Show association that animals will be exhibited at. The youth organizations should also play a role in this identification and tracking process.

Any database established for this program needs to be confidential and not shared with any other databases. The public should not be able use the Freedom of Information Act to gather information about livestock producers. Private data bases supported by producer organizations may be a workable solution. Producer information must be held confidential and only be used to prevent disease threats to human health.

The program should not be a required FSA program that determines Farm Program payments under the Farm Bill. The purposes and goals of these programs are different. Many FSA offices think they should administer the program. We have a lot of questions on how that might work.

Producers should not be subjected to any liability related to food safety issues related to this program. The NAIS program is not designed for that reason and thus would not be supported if liability for the producer does not end with the animal identification and tracking segments of the program.

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Thank you for allowing WPA to comment on this program.

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